

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Text-Enabled Toll Free Numbers)	WC Docket No. 18-28
)	
Toll Free Service Access Codes)	CC Docket No. 95-155

REPLY COMMENTS OF CENTURYLINK

I. INTRODUCTION

CenturyLink¹ files these reply comments in response to the *Declaratory Ruling and Notice of Proposed Rulemaking (Declaratory Ruling and NPRM)* released June 12, 2018, in the above-referenced dockets.² CenturyLink’s primary interest in this proceeding is as a Responsible Organization (“RespOrg”) for toll-free numbers. CenturyLink responds to the initial comments filed in this proceeding concerning the appropriate role of RespOrgs and other aspects of administration related to text-enabling toll-free numbers. CenturyLink’s goal is to make the process both transparent and efficient in order to promote the benefits of toll-free texting without risking potential abuses. To that end, although some commenters advocate that RespOrgs should have an active role in the text-enablement process, CenturyLink disagrees with that approach in favor of letting the toll-free subscriber and its messaging provider manage that feature of toll-free service since they are the parties directly involved in providing that functionality.

¹ These reply comments are filed by and on behalf of CenturyLink, Inc. and its subsidiaries.

² *Text-Enabled Toll Free Numbers; Toll Free Service Access Codes*, WC Docket No. 18-28 and CC Docket No. 95-155, Declaratory Ruling and Notice of Proposed Rulemaking, FCC 18-77 (rel. June 12, 2018) (*Declaratory Ruling and NPRM*).

II. RESP ORGS NEED NOT BE PART OF THE TEXT-ENABLEMENT PROCESS

The *NPRM* proposes to have the toll-free subscriber notify its RespOrg of the subscriber's authorization to text-enable a toll-free number and then to have the RespOrg be responsible for updating the appropriate records in the SMS database with that information.³ CenturyLink questions whether it is necessary to have the RespOrg be part of this process. Instead of the proposal in the *NPRM*, CenturyLink recommends that the toll-free subscriber work with its messaging provider to obtain the appropriate verification and update the SMS database. Under the *Declaratory Ruling*, the messaging provider is responsible for obtaining a toll-free subscriber's authorization before text-enabling a toll-free number,⁴ not the RespOrg. In order to keep this process "as simple and efficient as possible to further [the Commission's] policy goal of promoting the innovative texting feature[s] of these numbers[]"⁵ consistent with the *NPRM*, it seems the toll-free subscriber and messaging provider would be in a better position to manage these responsibilities than would the RespOrg.⁶ Once a messaging provider receives the appropriate authorization from a toll-free subscriber for text enablement, the messaging provider

³ *NPRM* at ¶ 13.

⁴ *Declaratory Ruling* at ¶ 11.

⁵ *NPRM* at ¶ 15.

⁶ For example, some RespOrgs may not offer text enablement of toll-free numbers either directly or through a third-party message provider. Although RespOrgs should not be allowed to prohibit text enablement of toll-free numbers assigned to their toll-free subscribers for voice, toll-free subscribers should not be made dependent upon RespOrgs to administer authorizing text enablement of subscribers' toll-free numbers without having an agreement to do so.

can proceed to make the appropriate updates in the SMS database.⁷ From CenturyLink's perspective, there does not seem to be a need to create a role for the RespOrg in this process.⁸

III. DATABASE CONSIDERATIONS RELATED TO TEXT ENABLEMENT

The *NPRM* also questions how and where information related to text enablement should be captured. CenturyLink notes that the SMS Database could accommodate information related to text enablement through the addition of relevant fields. Specifically, these additional fields should capture whether a subscriber has text enabled the toll-free number as well as the messaging provider providing that service.⁹ Messaging providers should then be authorized to update these fields in the SMS Database as they receive authorization from subscribers for text enablement. This approach would ensure that information on voice and text service related to toll-free numbers is captured in a single location.¹⁰ In its initial comments, CenturyLink explained that either a single or multiple registries could prove workable so long as sufficient safeguards were put in place.¹¹ To the extent that multiple registries are established, information updates concerning text enablement should be readily available in all relevant registries and transparent to users. CenturyLink agrees that work will need to be done to update any applicable registry or registries with those toll-free numbers that have already been text-enabled in order to

⁷ See, e.g., AT&T Comments, filed herein (Aug. 23, 2018) at 6 (observing that “messaging providers have the immediate subscriber relationship, as the subscriber seeks to text-enable their toll free number[]” and not the RespOrg).

⁸ AT&T Comments at 1 (“RespOrg...involvement in the text-enabling process is simply unnecessary[]”); see also, e.g., Ten Digit Communications LLC Comments, filed herein (Aug. 22, 2018) at 3.

⁹ *NPRM* at ¶¶ 17-18.

¹⁰ Bandwidth Inc. Opening Comments, filed herein (Aug. 23, 2018) at 7.

¹¹ CenturyLink Comments, filed herein (Aug. 23, 2018) at 1, 2-3.

have resources that are complete.¹² As noted above, messaging providers should be authorized to make these retroactive registrations since they – unlike RespOrgs – are directly involved in the service arrangement to provide text enablement.¹³

In addition, toll-free number subscribers and RespOrgs should be able to view and verify the text enablement status of their toll-free numbers free-of-charge. This capability would provide a useful check for subscribers or the RespOrgs that manage their toll-free numbers to ensure that those numbers have not been text-enabled without proper authorization. This transparency should help preserve the integrity of the text-enabling processing and prevent abuse.

IV. CONCLUSION

CenturyLink appreciates the Commission examination of additional measures to help ensure the efficient management and administration of text-enabled toll-free numbers. This rulemaking will foster modernizing the provision of toll-free services through text enablement to ensure that businesses, non-profit organizations, and individuals can better realize the benefits of toll-free texting. CenturyLink asks the Commission to align responsibilities related to text-

¹² *NPRM* at ¶ 23.

¹³ See, e.g., Somos, Inc. Comments, filed herein (Aug. 23, 2018) at 16.

enablement with those parties that are directly involved in the text-enablement process and relationship.

Respectfully submitted,

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